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June 7, 2019

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina

Re: • **Docket 2018-202-E - Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of CPRE Queue Number Proposal, Limited Waiver of Generator Interconnection Procedures, and Request for Expedited Review**
 • **Order No. 2019-247**

Ms. Boyd:

Pursuant to Order No. 2019-247 issued on April 9, 2019, in the above-captioned Docket, the South Carolina Solar Business Alliance, Inc., (“SBA”) hereby provides to the Commission its Report on, “...the progress of the Technical Standards Review Group [TSRG] in resolving the issues presented in this docket.” Unfortunately, the TSRG has made no progress in resolving the interconnection issues presented in this docket, nor will it as it is currently conceived of by Duke Energy Progress, LLC and Duke Energy Carolinas, LLC, (hereinafter together as, “Duke”).

In its February 15, 2019 Report to the Commission in this Docket, ORS recommended that the Commission open a new Docket, “...to specifically examine the technical issues contributing to the Companies’ interconnection queue challenges.” Report of Office of Regulatory Staff, Docket No. 2018-202-E (Feb. 15, 2019) (“ORS Report”), at 1. The SBA supported this recommendation. However, in its *Joint Initial Response To The Office Of Regulatory Staff’s Recommendations And South Carolina Solar Business Alliance’s Motion*, filed in this docket on March 26, 2019 (“Joint Response”), Duke suggested that a technical interconnection Docket was not necessary, and that the TSRG would provide a more appropriate and “...expedient...” forum for stakeholders (including the SBA) to “...resolve issues...” related to interconnection. Joint Response at 3-4.

What Duke did not explain to the Commission, but which is apparent both from SBA's experience of the TSRG and Duke's own report of the last TSRG meeting, is that Duke never intended the TSRG to be a forum for the *exchange* of ideas between the parties, or the resolution of any disagreement over Duke's technical standards. *See* Duke Report on TSRG (June 6, 2019) at 1, ("As Duke is solely accountable and responsible for maintaining adequate customer reliability and power quality on the DEC and DEP systems, **the TSRG is not a decision making venue.**"), (Emphasis supplied).

Rather, the goal of the TSRG is simply "...to foster greater transparency and improved understanding of the Companies' evolving interconnection standards and technical requirements." – *i.e.*, to inform stakeholders of what Duke's ever-changing interconnection standards are, generally after Duke has decided what those standards should be (and sometimes after they are already being implemented). *Id.* Although SBA agrees that transparency as to interconnection standards is a baseline requirement of any functioning interconnection system, SBA wishes to dispel any impression that the TSRG provides a forum for the resolution of issues related to interconnection.

This is borne out by the experience of SBA representatives and members at TSRG meetings. As reported by Duke, discussions at TSRG meetings have covered such topics as energy storage, voltage standards, line voltage regulators, and the commissioning process for solar facilities. And industry members have presented detailed, technically-supported proposals to Duke on topics including direct transfer trip (DTT) protection, volt-var control using smart inverters, and transformer inrush. **To SBA's knowledge, Duke has not accepted or acted on a single proposal made by the solar industry in the TSRG, nor has it made any changes to its technical policies as a result of TSRG discussions.**

In short, while the TSRG has provided greater transparency about Duke's technical standards and a forum in which the industry and Duke are free to talk about those standards, it has not been productive or successful in any other respect. Certainly, it does not appear to have contributed to resolving any of Duke's interconnection queue challenges. Although SBA is not making any specific requests or proposals in this Report, SBA anticipates making such a proposal to the Commission in the near future.

Respectfully Submitted,
AUSTIN & ROGERS, P.A.

/s/Richard L. Whitt,
Richard L. Whitt,
As Counsel for the South Carolina Solar Business
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RLW/cas

cc: All Parties of Record, (via, electronic mail)